## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN

IN RE: Ricky Neal Debra Neal Debtors

No. 11-71688-tjt Honorable Judge Thomas J. Tucker Chapter 13

## MOTION TO EXCUSE DEBTOR DEBRA NEAL'S ATTENDANCE FROM ALL COURT HEARINGS AND ALLOW CO-DEBTOR RICKY NEAL TO PROVIDE TESTIMONY ON HER BEHALF

Debra Neal by and through her attorney states as follows in support of her Motion:

- 1. Her 341 is scheduled for Tuesday January 31, 2012.
- 2. She suffers from diagnosed depression and panic attacks for which she takes sertraline and clonazapam and is therefore unable to travel to Detroit and testify.
- 3. Her codebtor is fully competent and able to testify to her financial affairs.

WHEREFORE, Debtor respectfully request that this Honorable Court excuse her from all court hearings and allow co-debtor Ricky Neal to provide testimony on her behalf.

Dated: January 20, 2012 /s/Robert Keyes

Robert Keyes (P-68856) Attorney for Debtor Debra Neal 300 North Huron Street, Ypsilanti, MI 48197

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The Chapter 13 debtors have filed papers with the court to excuse Debra Neal from Attendance at all Court Hearings and Allow Co-Debtor Ricky Neal to Provide Testimony on her Behalf.

Your rights may be effected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one).

If you do not want the court to allow this motion, or want the court to consider your views on the motion, then within 14 days, you or your attorney must:

1. File with the court a written response to the Motion, explaining your position, at:

U.S. Bankruptcy Court 211 W. Fort Street, Suite 2100 Detroit, Michigan 48226

If you mail your response to the court for filing, you must mail it early enough so that the court will receive it on or before the date stated above.

You must also mail a copy to:

Robert Keyes Law 300 North Huron Street. Ypsilanti, Michigan 48197 Chapter 13 Trustee Tammy L. Terry 535 Griswold, Suite 2100 Detroit, MI 48226

If you, or your attorney, do not take these steps, the Court may deem that you do not oppose the relief sought in the motion and may enter an order granting the relief.

Dated: January 20, 2012 Respectfully submitted,

/s/Robert Keyes\_\_\_\_\_

Robert Keyes (P-68856) Attorney for Debtor Debra Neal

300 North Huron Street, Ypsilanti, MI 48197

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IN RE: Ricky Neal Debra Neal Debtors

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# PROOF OF SERVICE OF MOTION TO EXCUSE DEBTOR DEBRA NEAL'S ATTENDANCE FROM ALL COURT HEARINGS AND ALLOW CO-DEBTOR RICKY NEAL TO PROVIDE TESTIMONY ON HER BEHALF

The undersigned hereby states that he did serve the Motion to Excuse Debtor Debra Neal's Attendance from All Court Hearings and Allow Co-Debtor Ricky Neal to Provide Testimony on her Behalf, Notice of Motion, Proposed Order and Proof of Service via the courts Electronic Case Filing System or First Class U.S. Mail upon the following:

See attached Matrix

Dated: January 20, 2012 /s/Robert Keyes

Robert Keyes (P-68856)

Attorney for Debtor Debra Neal 300 North Huron Street, Ypsilanti, MI 48197

Phone: (734) 662-1590

E-mail: robert@robertkeyeslaw.com